

REMARKS

Initially, Applicants thank the Examiner for the courtesies extended during the recent telephonic interview held on March 28th. The claim amendments and arguments submitted in this paper are consistent with the amendments and arguments presented during the course of the interview.

The Office Action mailed January 24, 2007 considered claims 1-34. Claims 1-34 were rejected under 35 U.S.C. 103(a) as being unpatentable over Dicorpo et al. (US 6,816,917), hereinafter *Dicorpo* in view of Narain (US 2003/0084135), hereinafter *Narain*.¹

By this amendment claims 1, 11-15 and 24 have been amended.² Claims 30-34 have been cancelled. Accordingly, claims 1-29 are pending, of which claims 1, 14 and 24 are the only independent claims at issue.

The present invention is generally directed to configuring the computer system to securely communicate with a target device over the network. For example, claim 1 defines exposing an abstraction component comprising logic that may be used to configure any of the plurality of initiators, the abstraction component being a component of an initiator abstraction module configured to enforce consistent security configuration settings between initiators. Next, claim 1 defines receiving registration information on the occurrence of some event through the abstraction component that a selected initiator from among the plurality of initiators is to be configured to communicate with a selected target device. Next, claim 1 defines the abstraction component retrieving security information from a database that includes information that is relevant to configuring security for any of the plurality of initiators such that consistency between initiators' security configuration settings is ensured.

Next, claim 1 defines identifying a security configuration of the selected initiator using the retrieved security information. Next, claim 1 defines determining that if the identified security configuration were applied to the selected initiator, the applied identified security configuration would not cause the selected initiator to conflict with any of the existing security configurations of the other of the plurality of initiators. Lastly, claim 1 defines, upon determining

¹ Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

² Support for the amendments to the claims are found throughout the specification and previously presented claims, including but not limited to paragraphs [0036]-[0039], [0044] and Figures 2 & 3.

that the identified security configuration would not cause the selected initiator to conflict with any of the existing security configurations of the other of the plurality of initiators, configuring the selected initiator using the identified security configuration.

Claim 14 is a method claim similar to claim 1 that includes functional language. Claim 24 is a computer program product claim corresponding to claim 1. Applicants respectfully submit that the cited art of record does not anticipate or otherwise render the amended claims unpatentable for at least the reason that the cited art does not disclose, suggest, or enable each and every element of these claims.

Dicorpo describes a storage system with Logical Unit Number (LUN) virtualization. *Dicorpo* teaches a system capable of managing access to a physical device from among a plurality of initiators. *Dicorpo* further teaches using an interface coupled to a data path between the initiators and the physical device and a controller to resolve conflicting concurrent attempts to access the physical device (Col. 4:32-47). Upon receiving multiple concurrent attempts to access the physical device, the virtual device object emulates responses of the physical device and redirects access to the physical device when the physical device becomes available (Claim 1). *Dicorpo* discloses that some implementations can be used for Internet SCSI (iSCSI) applications, using a LUN to categorize each iSCSI device (Col. 11:15-Col. 12:16).

Narain teaches a method and system wherein end-to-end service requirements are reduced to intermediate abstractions (Abs.). More specifically, a configuration database is maintained which contains vendor neutral configuration parameters for devices on the network. A diagnosis engine determines correct parameters based on those contained in the database and provisions the network devices based on the determined parameters (par. [0015]).

Neither *Dicorpo* nor *Narain* teach or suggest exposing an abstraction component comprising logic that may be used to configure any of the plurality of initiators, the abstraction component being a component of an initiator abstraction module configured to enforce consistent security configuration settings between initiators, as recited in claim 1. Furthermore, neither *Dicorpo* nor *Narain* teach or suggest receiving registration information on the occurrence of some event through the abstraction component that a selected initiator from among the plurality of initiators is to be configured to communicate with a selected target device, as recited in claim 1. At least for either of these reasons, claim 1 patentably defines over the art of record. At least for either of these reasons, claims 14 and 24 also patentably define over the art

of record. Since each of the dependent claims depend from one of claims 1, 14 and 24, each of the dependent claims also patentably define over the art of record for at least either of the same reasons.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at 801-533-9800.

Dated this 25th day of April, 2007.

Respectfully submitted,



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